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d/b/a Buffalo Ranch

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GREGORY R. RAIFMAN, et al.

Plaintiffs,

v.

CLASSICSTAR, LLC, et al.

Defendants.

Case No. 3:07-cv-02552-MJJ

**MOTION TO REMOVE VANESSA
IMBERG AND SUBSTITUTE
JASON W. CROWELL AS
COUNSEL OF RECORD**

This Motion to Remove Vanessa Imberg and Substitute Jason W. Crowell as counsel of record for Strategic Opportunity Solution, LLC, d/b/a Buffalo Ranch is hereby submitted by the undersigned counsel and in support thereof, the undersigned counsel states as follows:

1. Vanessa Imberg no longer works for STOEL RIVES LLP. Therefore, she will no longer participate in any way in this case.

2. Jason W. Crowell, who works for STOEL RIVES LLP, and a member in good standing of the Bar of California who is registered for ECF in the Northern District at San Francisco, should be substituted as counsel of record in this case for Buffalo Ranch.

2. Vanessa Imberg also currently appears on the Manual Notice List for Master Case No. 5:07-cv-00353-JMH, In Re: ClassicStar Mare Lease Litigation, which is was transferred by

MOTION TO REMOVE VANESSA IMBERG
AND SUBSTITUTE JASON W. CROWELL
AS COUNSEL OF RECORD

1 the Panel on Multidistrict Litigation to the U.S. District Court for the Eastern District of
2 Kentucky (identified as associated Case No. 5:07-cv-347-JMH). Based on the fact that Vanessa
3 Imberg no longer works for STOEL RIVES LLP, she will no longer participate in any way in the
4 Master Case referenced in this paragraph. A separate Motion to remove her from the Manual
5 Notice List will also be filed in the Master Case No. 5:07-cv-00353-JMH, in the U.S. District
6 Court for the Eastern District of Kentucky.

7 Based upon the foregoing, the undersigned counsel respectfully requests that this Court
8 enter its Order removing Vanessa Imberg as counsel of record in this case and substituting
9 Jason W. Crowell as counsel of record for Strategic Opportunity Solution, LLC, d/b/a Buffalo
10 Ranch.

11 DATED this 12th day of December, 2007.

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13 STOEL RIVES LLP

14
15 /s/ Jason W. Crowell
16 Jason W. Crowell, California Bar No. 222509
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24 Attorney for Strategic Opportunity Solution, LLC
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26 MOTION TO REMOVE VANESSA IMBERG
AND SUBSTITUTE JASON W. CROWELL
AS COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2007, I caused the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following individuals whose names appear on the E-notification List for this case.

- **John Somers Blackman**
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- **Vanessa A. Imberg**
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I further certify that I caused the foregoing document to be mailed via First-Class Mail to the following non-CM/ECF participants whose names appear on the Manual Notice List for this case.

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MOTION TO REMOVE VANESSA IMBERG
AND SUBSTITUTE JASON W. CROWELL
AS COUNSEL OF RECORD

1 Ory Sandel
2 Idell & Seitel LLP
3 465 California Street, Suite 300
4 San Francisco, CA 94104

5 DATED this 12th day of December, 2007.

6 STOEL RIVES LLP

7 /s/ Jason W. Crowell

8 Jason W. Crowell, California Bar No. 222509

9 STOEL RIVES LLP

10 Attorney for Strategic Opportunity Solution, LLC
11 d/b/a Buffalo Ranch
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